CLOSURE PLAN CONTENTS AND TECHNICAL REVIEW

3.12 - SOIL REMOVAL/CLEANUP PROCEDURES

Introduction

This information should be submitted by the owner or operator so the Department will know how the facility plans to manage contaminated soil which they might find as a result of conducting the soil sampling as detailed in the soil sampling section of the closure plan. They should describe how they plan to remove contaminated soils to achieve their proposed cleanup levels. It is possible that they might propose not to remove any soils but rather leave hazardous constituents in place and justify doing so via a health based risk assessment. Until the exact amount of soil contamination is known, there should be generic wording that in the event there is soil contamination they will remove and ship offsite. They have the option to treat onsite but they cannot do so until they submit more details at a future date and they cannot proceed until a permit or interim status modification has been approved.

Submittals Required by Applicant

Soil Removal - If the facility chooses to remove contaminated soil by excavation they must describe how contaminated subsoils under and around the regulated unit would be excavated and handled after the waste inventory in the regulated unit, all equipment and containment pads/berms have been completely removed. It should be pointed out that the facility does not need the Department's approval as part of the closure plan to remove waste inventories which they are holding in permitted tanks, containers, etc. Actually, it is environmentally preferred that these materials are removed and managed properly as hazardous wastes thus reducing the potential for any releases.

The surrounding soils should be excavated in a logical, layer-by-layer sequence unless there are physical constraints, e.g., stability of nearby structures. Additionally, the excavation should be scheduled to limit the potential effect of rainfall that may transport contaminants further through the soil.

The excavation technique should include provisions to minimize the generation of dust. This can include water sprays to knock down dust particulates from the air during excavation.

The plan should include a map or site plan showing the location of the regulated unit, the extent of contamination and the extent of proposed excavation.

Offsite Disposal of Contaminated Soils - If the facility proposes to dispose of all contaminated soils offsite, the permit writer need only check that the facility plans to manage the soils as hazardous wastes and they will utilize appropriate procedures, for example, manifesting, DOT containers, will ship to an authorized disposal facility, etc. Refer to Chapter 3.5 for guidance since these soils should be managed the same as hazardous waste inventories.

Onsite Cleanup of Contaminated Soils - If the facility proposes to treat contaminated soils onsite in the event contamination is encountered, then the permit writer must make sure that the closure approval letter states that the Department is not approving the use of treatment equipment onsite at this time. The closure plan can be approved with this restriction. The facility must submit a separate closure plan modification or permit application for this treatment system with detailed technical information, the same as any hazardous waste treatment system that requires a permit. The permit writer would review this application according to the applicable sections of the Permit Writer Instructions and process it according to closure plan modification procedures which include public notice and a CEQA determination.

WP File Name: CH0312_C.MAN

List of Examples:

List of Attachments:

List of References:

List of Appendices: